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From: Clauson, Karen L.
Sent: Tuesday, September 16, 2003 2:49 PM
To: 'Jodi.Smith@usdoj.gov'
Cc: Oxley, J. Jeffery
Subject: DS1 capable loop update

A problem has arisen with respect to the DS1 capable loop issue. Qwest has said that it will convert the lines that CLECs had to order as private lines (because of Qwest's invalid CRUNEC policy) to DS1 capable loops to help remedy this situation. Now that Eschelon has attempted to take Qwest up on that commitment, however, Eschelon has found that Qwest's process does not work. The process on the web (which Qwest told Eschelon it had used to perform "thousands" of such conversions) is too high level and does not provide enough information to convert the lines. Qwest provided a more detailed process to Eschelon, but it did not work. It appeared that Qwest had not notified or trained its centers on the process. The circuit id numbers, for example, are supposed to change from the private line id to the DS1 capable loop id, but didn't do so. Qwest only processed 3 orders under that process.

Qwest provided a second detailed process to Eschelon. That process doesn't work either, and conversion orders are at a standstill. (Qwest is requiring CLECs to submit LSRs to convert the lines, even though CLECs have already had to submit two LSRs for these lines -- one for the rejected DS1 capable loop order and another for the private line. This third LSR submission is more work and expense that Qwest's invalid policy has placed on CLECs.) It appears that Qwest is saying that the second process doesn't work because Qwest, in developing it, did not account for the differences between EDI and GUI users and the different versions of those. A Qwest edit in IMA is preventing the orders from executing.

Eschelon needed to get all of the conversion LSRs submitted ASAP so that this issue does not continue to affect later months. Now, however, there is a delay while Qwest tries to establish a working process. When developed, it should be documented and accessible to CLECs so other CLECs don't have to have these problems as well.

Although Qwest is indicating that it is converting the private lines to DS1 capable loops, the process doesn't work at this time.

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